

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

October 2, 2001

Joe Legare  
Assistant Manager for Environment  
and Infrastructure  
Department of Energy-RFFO  
P.O. Box 928  
Golden, CO 80402-0928

RE: Annual Update for the Historical Release Report, September 2000

Dear Mr. Legare;

The Colorado Department of Public Health and Environment has reviewed the September 2000 Annual Update for the Historical Release Report. This report updates IHSSs/PACs with additional information including the results of characterization and remediation activities, and makes recommendations for No Further Action (NFA). It should be noted that in concurring with NFA recommendations, CDPHE is using the term generically to include the meaning of the term, "No Further Remedial Action" as described in RFCA Attachment 6. That is, NFA determinations based on values derived from restricted land uses cannot be considered approved for No Further Action in a CAD/ROD without further evaluation. Only those areas meeting unrestricted release criteria can be designated NFA in a CAD/ROD document; all other areas will require use restrictions.

CDPHE concurs with the recommendations for No Further Action for the following PACs/IHSSs:

- PAC 300-156.1, Building 371 Parking Lot
- PAC 600-164.1, Radioactive Slab from Bldg. 771
- PAC 700-123.1, Valve Vault 7
- PAC 900-108, Trench T-1
- PAC 900-1311, Septic Tank East of Bldg. 991
- PAC 900-1318, Release of F001 Listed Waste Water to Soil

CDPHE concurs with the recommendations for No Further Action for the following PACs/IHSSs, but with recommendations for some minor changes/corrections to documentation:

- PAC NE-1409, Interceptor Trench Pump House
- NE-110, Buffer Zone Operable Unit, Trench T-3
- PAC 600-1001(a), Spills of Unknown Oil in PAC 600-1001 (SIR #318)
- PAC 900-183, Gas Detoxification Area

For the following PACs, it is recognized that the Site has not made any recommendation for NFA, and the CDPHE has no specific comments to offer at this time.

1/4  
DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

ADMIN RECORD

SW-A-004398

- PAC NE-1404, Diesel Spill at Pond B-2 Spillway
- PAC 100-607, Building 111 Transformer PCB Leak
- PAC 500-169, Waste Drum Peroxide Burial
- PAC 600-189, Nitric Acid Tanks
- PAC 700-1102, Transformer Leak 776-4
- PAC 900-112, 903 Pad
- PAC 900-140, Hazardous Disposal Area
- PAC 900-155, 903 Lip Area

The enclosed attachment contains comments on specific PACs/IHSSs in this HRR Annual Update.

If you have any questions concerning these comments, please contact Rich Horstmann at 303-692-3377, or Carl Spreng at 303-692-3358.

Sincerely,



Steven H. Gunderson  
RFCA Project Coordinator

xc: Tim Rehder, EPA  
Dave Shelton, Kaiser-Hill  
Dan Miller, AGO  
Susan Chaki, CDPHE  
Administrative Records, Building 850



Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

Comments on  
Annual Update for Historical Release Report  
September 2000

(KH-00-900.UN)

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PAC NE-110, Buffer Zone Operable Unit, Trench T-3

In general we concur with the NFA recommendation, based upon this site having been excavated as much as required by a decision document and the subsequent installation of a groundwater remediation system.

However, we still have some concerns that were first noted in our comments on the 1997 report. On page 18 of the 1997 HRR report, there is a statement that "Analytical data from this removal action indicate that disposal of the 2,400 gallons of lathe coolant from Building 444 occurred in another trench and not T-3". We asked for documentation about what happened to this coolant for consideration in the ER ranking for other East Trenches. In the 2000 HRR report, all the text about this coolant was removed with no explanation, and so our comment remains unanswered.

Also, there still needs to be a correction to the definition of the East Trenches. It should read, "Trenches T-1 through T-13 are referred to as the East Trenches."

PAC NE-1404, Diesel Spill at Pond B-2 Spillway

CDPHE sent comments on this PAC to the Site in relation to the 1998 HRR report. The Site is planning on doing soil sampling in accordance with the Buffer Zone Sampling and Analysis Plan, and has not recommended this PAC for NFA. CDPHE has no additional comments at this time.

PAC NE-1409, Interceptor Trench Pump House

Tables 2.1 and 2.2 both list Potential Contaminants of Concern, but the only contaminant they have in common is methylene chloride. The text should explain this discrepancy and the rationale for selecting the contaminants in Table 2.2, which form the basis for the NFA proposal.

The Tier I action level value for methylene chloride in Table 2.2 is in error because of a mistake in the action level tables. The Tier I value for methylene chloride in surface soil should be  $5.98E+04$  – two orders of magnitude higher than the Tier II value. This error does not change the basis for the NFA recommendation; we concur with the proposal for NFA.

PAC 100-607, Building 111 Transformer PCB Leak

Sampling is to be done in association with Building 111 Cluster D&D. No NFA determination has been requested yet.

PAC 300-156.1, Building 371 Parking Lot

We concur with the recommendation for NFA.

PAC 500-169, Waste Drum Peroxide Burial

Further characterization is needed. There has been no recommendation for NFA.

PAC 600-164.1, Radioactive Slab from Bldg. 771

We concur with the request NFA determination.

PAC 600-189, Nitric Acid Tanks

Soil sampling is to be conducted in accordance with IA SAP. No NFA recommendation has been made yet. .

PAC 600-1001(a), Spills of Unknown Oil in PAC 600-1001 (SIR #318)

We concur with the NFA recommendation for 600-1001(a), provided that the underlying PAC 600-1001 is investigated.

PAC 700-123.1, Valve Vault 7

We concur with the NFA recommendation for this PAC.

PAC 700-1102, Transformer Leak 776-4

We have not seen any of the data that was supposed to be collected for this PAC yet. There is currently no recommendation for NFA.

PAC 900-108, Trench T-1

We concur with the NFA recommendation for this PAC.

PAC 900-112, 903 Pad

There currently is no recommendation for NFA. An IM IRA will be written.

PAC 900-140, Hazardous Disposal Area

Additional assessment of this PAC will be done in relation to the 903 Drum Storage, Lip Area and Americium Zone interim measures/interim remedial action (IM/IRA). There is currently no recommendation for NFA.

PAC 900-155, 903 Lip Area

No NFA concurrence has been requested. An IM/IRA will be done. In light of new RSALs, we may need to re-evaluate this IHSS.

PAC 900-183, Gas Detoxification Area

We concur with the NFA recommendation based upon the RCRA Revised Closure Plan dated September 1995. The revised Closure Plan states, "Because this unit only stored expired or excess compressed gas cylinders, and all the compounds were gases, sampling of a surface rinse and soils for verification of decontamination is not necessary to confirm their absence." A reference to this document should be included as part of the NFA justification for this PAC.

PAC 900-1311, Septic Tank East of Bldg. 991

We concur with the NFA recommendation for this PAC.

PAC 900-1318, Release of F001 Listed Waste Water to Soil

We concur with the NFA recommendation for this PAC.